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8



9 Attorneys for Plaintiff
UNITED STATES OF AMERICA
10

UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

11 UNITED STATES OF AMERICA,
12

13 Plaintiff,
14

15 v.
16

ROHAN SANDEEP RANE, ET AL.
17

18 Defendants.
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No. 2:25-cr-00040-HDV

GOVERNMENT'S EX PARTE APPLICATION
FOR ORDER SEALING INDICTMENT AND
RELATED DOCUMENTS; DECLARATION OF
CATHARINE A. RICHMOND

(UNDER SEAL)

20 The government hereby applies ex parte for an order that the
21 indictment and any related documents in the above-titled case (except
22 the arrest warrants for the charged defendants) be kept under seal
23 until the government files a "Report Commencing Criminal Action" in
this matter.

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1 This ex parte application is made pursuant to Federal Rule of
2 Criminal Procedure 6(e)(4) and is based on the attached declaration
3 of Catharine A. Richmond.

4 Dated: January 16, 2025

Respectfully submitted,

5 E. MARTIN ESTRADA
6 United States Attorney

7 LINDSEY GREER DOTSON
8 Assistant United States Attorney
9 Chief, Criminal Division

Catharine Richmond

10 CATHARINE A. RICHMOND
11 Assistant United States Attorney

12 Attorneys for Plaintiff
13 UNITED STATES OF AMERICA
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DECLARATION OF CATHARINE A. RICHMOND

I, CATHARINE A. RICHMOND, declare as follows:

1. I am an Assistant United States Attorney in the United States Attorney's Office for the Central District of California. I represent the government in the prosecution of United States v. RANE et al., the indictment in which is being presented to a federal grand jury in the Central District of California on January 17, 2025.

2. The defendants charged in the above-captioned indictment have not been taken into custody on the charge contained in the indictment and have not been informed that they are being named as defendants in the indictment to be presented to the grand jury on January 17, 2025. The likelihood of apprehending defendants WALKER and BORGE might jeopardized if the indictment in this case were made publicly available before either is taken into custody on the indictment. In addition, other members of defendants' enterprise, CVLT, and its offshoots, have been known to scour the internet for information about law enforcement actions and share the information to assist others in evading detection and arrest.

3. Accordingly, the government requests that the indictment and sealed documents in this case (except the arrest warrants) be sealed and remain so until one of the defendants is taken into custody on the charges contained in the indictment and the government files a "Report Commencing Criminal Action" in this matter.

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4. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that this declaration is executed at Los Angeles, California, on January 16, 2025.

Catharine Richmond

CATHARINE A. RICHMOND

1 E. MARTIN ESTRADA
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2 LINDSEY GREER DOTSON
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8 Attorneys for Plaintiff
9 UNITED STATES OF AMERICA

10 UNITED STATES DISTRICT COURT

11 FOR THE CENTRAL DISTRICT OF CALIFORNIA

12 UNITED STATES OF AMERICA,

13 Plaintiff,

14 v.

15 ROHAN SANDEEP RANE, ET AL.,

16 Defendants.

No. 2:25-cr-00040-HDV

~~[PROPOSED]~~ ORDER SEALING
INDICTMENT AND RELATED DOCUMENTS

(UNDER SEAL)

18 For good cause shown, IT IS HEREBY ORDERED THAT:

19 Pursuant to Federal Rule of Criminal Procedure 6(e)(4), the
20 indictment and any related documents in the above-titled case (except
21 the arrest warrants), the government's sealing application, and this
22 order shall be kept under seal until such time as the government
23 files a "Report Commencing Criminal Action" in this matter.

24
25 1/17/2025

/S/

26 DATE

HONORABLE STEVE KIM
UNITED STATES MAGISTRATE JUDGE

1 **OR IN CASE OF DENIAL:**

2 The government's application for sealed filing is DENIED. The
3 sealing application will be filed under seal. The underlying
4 documents shall be returned to the government, without filing of the
5 documents or reflection of the name or nature of the documents on the
6 clerk's public docket.
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9 _____
DATE

HONORABLE STEVE KIM
UNITED STATES MAGISTRATE JUDGE